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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

FABRICE ROUZIER, an individual, and B.E.  
RELATIONS, LLC, a New York limited liability  
company,

Plaintiffs,

-against-

JOE GILLES a/k/a JOÉ DWÈT FILÉ, DF EMPIRE,  
PLAY TWO, DAMINI OGULU a/k/a BURNA BOY,  
ATLANTIC RECORDS GROUP, UNIVERSAL  
MUSIC PUBLISHING FRANCE, and DANIEL FILS  
AIMÉ a/k/a TONTON BICHA,

Defendants.

Case No. 1:25-cv-2226 NCN-CLP

**AFFIRMATION OF KERRY A. BRENNAN, ESQ.  
IN SUPPORT OF ENTRY OF CERTIFICATE OF DEFAULT  
AGAINST DEFENDANT DANIEL FILS AIMÉ A/K/A TONTON BICHA**

Kerry A. Brennan, Esq., declares as follows:

1. I am admitted to this Court and a member of the firm of Brennan Law Firm PLLC, attorneys for Plaintiffs Fabrice Rouzier and B.E. Relations LLC. in the above-titled action. I am fully familiar with all the facts and circumstances in this action.

2. I make this affirmation in support of Plaintiffs' application for issuance of a certificate of default against Defendant DANIEL FILS AIMÉ a/k/a TONTON BICHA.

3. This action was commenced on April 22, 2025.

4. On May 20, 2025, a copy of the Summons and the Complaint was served on Defendant DANIEL FILS AIMÉ a/k/a TONTON BICHA under F.R.C.P. 4(e)(2)(A), and, on May 30, 2025, an Affidavit of Service was filed with this Court. ECF Dkt. 23.

5. Mr. FILS AIME'S deadline to respond to the Complaint was June 10, 2025.

6. I received a call from a lawyer on behalf of Mr. FILS AIME prior to the deadline of June 10, 2025. I granted an extension of time to respond to the Complaint until June 17, 2025.

7. No further extension of the deadline to respond to the Complaint was requested or extended.

8. Based on Plaintiff Rouzier's authorship of the music and lyrics of the musical work "Je Vais" and ownership of the master sound recording of "Je Vais" (music and lyrics: Reg. No. PA 2-522-140, and in the sound recording: Reg. No. SR 1-025-328), Plaintiffs brought a copyright infringement claim against Mr. FILS AIME as a result of Mr. FILS AIME'S unauthorized public performances of portions of "Je Vais" in the infringing work "4 Kampe." Plaintiffs seek relief in the form of permanent injunction to prohibit Mr. FILS AIME from publicly performing "Je Vais" or any portion thereof without the consent of Plaintiffs and disgorgement of all profits received by Mr. FILS AIME from such performances.

9. Defendant DANIEL FILS AIMÉ a/k/a TONTON BICHA has not answered the Complaint, and the time for him to answer the complaint has expired.

10. Attached as Exhibit A is a proposed Certificate of Default.

11. Defendant DANIEL FILS AIMÉ a/k/a TONTON BICHA is not a minor, mentally incompetent nor in the military service of the United States.

WHEREFORE, Plaintiffs request that the default of Defendant DANIEL FILS AIMÉ a/k/a TONTON BICHA be noted and a certificate of default be issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

Dated: New York, New York  
July 21, 2025

Kerry A. Brennan